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Attorneys for Proposed Interim Class

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

_____X	:	Civil Action No. 07-2867 (NLH)
In Re Pet Foods Products	:	
Liability Litigation	:	MDL DOCKET NO. 1850
	:	
	:	ALL CASES
_____X		

REPLY DECLARATION OF ALAN E. SASH

Alan E. Sash, an attorney duly admitted to practice law in the Courts of the State of New Jersey and the United States District Court of the District of New Jersey, declares the following to be true under the penalties of perjury pursuant to 28 U.S.C. §1746:

1. I am a member of the law firm McLaughlin & Stern, LLP, attorneys for the proposed interim class. I submit this reply declaration in further support of our application to be assigned interim lead class counsel in the above matter.

2. We intentionally did not submit opposition papers to the other plaintiffs firms' motions to be appointed lead counsel for three reasons. First, we rely on our own merits and not the disparagement of others. Second, we neither wanted to alienate nor antagonize counsel that we wish to work with in this matter. Third, we did not feel it is necessary to increase the legal fees of the Class in order to oppose firms that seek to represent the Class.

3. All movants are qualified for the position and we respectfully submit that in the end we have the most experience in this somewhat unique and narrow field of pet-related nationwide class action litigation. None of the other moving counsel has that experience. In fact, our prior experience has just resulted in a favorable settlement which was reported by Business Week on September 17, 2007. A true and correct copy of that article is attached hereto as Exhibit A.

4. Although we believe that we are best suited for the position, the quality and passion of all movants suggest that a combined effort may be most valuable to the Class in the end. All of the movants for lead counsel have been working in an attempt to properly mediate this dispute. These collective efforts will undoubtedly move the case in a productive and positive direction.

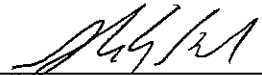
5. The putative class may be best served if all three of the plaintiffs' "camps" moving for lead counsel compromise and, like the defendants, divide the labor as follows –

- (a) prosecuting/settling claims against the Menu Foods defendants (a non-specific manufacturer);
- (b) prosecuting/settling claims against the brand-names manufacturers; and

(c) prosecuting/settling claims against the retailers.

6. I leave the wisdom of this proposal to the Court and input from counsel.

Dated: New York, New York
September 19, 2007



Alan E. Sash (AS 8804)